

ORIGINAL

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at 1 o'clock and 45 min P M
SUE BEITIA, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

IN THE MATTER OF THE) Civil NO. CV05-00037 HG-BMK
COMPLAINT OF BLUE)
DOLPHIN CHARTERS, LTD.) [3 Consolidated Cases]
AND TERRY DONNELLY, AS) CLAIMANTS EXPERT DISCLOSURE
OWNERS OF THE VESSEL) PURSUANT TO RULE 26(a)(2) OF THE
M/V BLUE DOLPHIN, O/N) FEDERAL RULES OF CIVIL
1082213, FOR) PROCEDURE; CERTIFICATE OF
EXONERATION FROM) SERVICE
AND/OR LIMITATION OF)
LIABILITY,)

) Civil NO. CV05-00037 HG-BMK
) [3 Consolidated Cases]
)
) CLAIMANTS EXPERT DISCLOSURE
) PURSUANT TO RULE 26(a)(2) OF THE
) FEDERAL RULES OF CIVIL
) PROCEDURE; CERTIFICATE OF
) SERVICE
)
)
)
)
) Non-Jury Trial Date: April 11, 2006
) Judge: The Hon. Helen Gillmor

MATTHEW ISHAM,) CIVIL NO.: CV 04 00559 HG-BMK
individually and as Guardian Ad)
Litem for HAYDEN ISHAM, a)
minor; ROXANNE BEST)
ISHAM,)
)
Plaintiffs,)
)
vs.)
)
BLUE DOLPHIN CHARTERS,)
LTD. and BLUE DOLPHIN)
DIVING, LTD., CAPTAIN)
ANDY'S SAILING, INC.,)
DOES 1 - 50,)
)
Defendants.)
)

DENNIS CLAYPOOL,) CIVIL NO.: CV 04 00570 HG-KSC
SHERYL CLAYPOOL)
individually and as Guardian ad)
Litem for KRISTEN)
CLAYPOOL, a minor, SCOTT)
CLAYPOOL,)
)
Plaintiffs,)
)
vs.)
)
CAPTAIN ANDY'S SAILING,)
INC., BLUE DOLPHIN)
CHARTERS, LTD. And BLUE)
DOLPHIN DIVING, LTD.,)
)
Defendants.)
)
)

CLAIMANTS EXPERT DISCLOSURE PURSUANT TO
RULE 26(a)(2) OF THE FEDERAL RULES OF CIVIL PROCEDURE

Claimants/Respondents and Plaintiffs MATTHEW ISHAM, individually and as Guardian ad Litem for, HAYDEN ISHAM, a minor and ROXANNE BEST ISHAM ("Claimants"), hereby comply with Rule 26(a)(2), Fed.R.Civ.P., by making the following expert disclosures:

1. Bret Gilliam, Ocean Tech, 54 Stonetree Road, Arrowsic, ME 04530. Mr. Gilliam will testify as to liability as to Blue Dolphin and Captain Andy's. A copy of Mr. Gilliam's Report, CV, a list of his prior testimony and/or depositions, and fee schedule will be provided.
2. Dr. Jack P. Suyderhoud, University of Hawaii Monoa, College of Business Administration, 2404 Maile Way, Honolulu, Hawaii 96822. Dr. Suyderhoud will testify as to economic damages for future medical costs and wage loss. A copy of Dr. Suyderhoud's Report, CV, a list of his prior testimony and/or depositions, and fee schedule will be provided.
3. Dr. David A. Youngblood, 59-404 Makanna Road Haleiwa, HI 96712. Dr. Youngblood will testify as to Matthew Isham's inability to be employed as a dive instructor. A copy of Mr. Youngblood's Report, CV, a list of his prior testimony and/or depositions, and fee

schedule will be provided.

4. Michael L. Slutzker, M.D., F.A.A.O.S, 4201 Torrance Blvd., Suite 470, Torrance, CA 90503. Dr. Slutzker is the orthopedic physician for Matthew Isham and he will testify as to Isham's future medical problems. A copy of Dr. Slutzker's Report, CV, a list of his prior testimony and/or depositions, and fee schedule will be provided.
5. George Newton, CPO at C.R. Newton, 1575 Beretania, Honolulu, Hawaii 96826. C.R. Newton has supplied Matthew Isham's prosthetic legs. Mr. Newton will testify as to the benefits of a prosthetic leg and the cost and maintenance. A copy of Mr. Newton's Report, CV, a list of his prior testimony and/or depositions, and fee schedule will be provided.
6. All experts identified by any other party in their disclosure of expert witnesses.
7. Rebuttal experts as necessary.

Claimants reserve the right to call additional experts as may be required by further discovery in the matter.

Claimants reserve the right to amend and/or supplement these expert disclosures as additional documents and things are located and/or discovered.

DATED: Redondo Beach, California, February 6, 2006.

LESSER & ASSOCIATES, PLC

A handwritten signature in black ink, appearing to read 'RL', is positioned above a horizontal line.

RICHARD A. LESSER

Attorneys for Claimants/Respondents and
Plaintiffs MATTHEW ISHAM, individually
and as Guardian ad Litem for, HAYDEN
ISHAM, a minor and ROXANNE BEST
ISHAM